
2.0 Overview of Public Comments Received



This section provides an overview of the public comments that were submitted following the public comment period, which was held from 14 January to 14 March 2000.

2.1 Number of Comments Received

A total of 73 comment letters were received by the Services pertaining to the DEIS and HCP: 10 from government agencies, 2 from tribal representative organizations, 11 from public organizations, and 50 from individual citizens. Many of the comments and suggestions were incorporated into the HCP and FEIS. This FEIS Volume (II) contains: 1) copies of the comment letters, 2) summaries of comments and responses, and 3) a summary of changes made to the HCP and DEIS as a result of comments.

2.2 Process for Responding to Comments

The comments received ranged from detailed scientific comments, to expressions of opinion on various issues, to comments that were essentially votes on different alternatives. To make this large number and wide range of comments more accessible, 31 “General Comments” with associated responses were developed that summarized the range of issues raised in both oral testimony and written comments. These General Comments and Responses are provided in Section 3.0.

In addition to the General Comments and Responses, “Specific Comments” were identified and read by the appropriate Tacoma Water resource specialists and the Services, who prepared individual detailed responses. These Specific Comments and their associated responses are provided in Section 4.0.

Copies of all comment letters are located at the beginning of Section 4.0. Comment letters were divided into six categories: 1) Independent (IND), 2) Non-governmental Organization (NGO), 3) Tribal (TRI), 4) Federal (FED), 5) State (STA), and 6) Municipal agency (MUNI). To see how

comments were addressed, refer first to the appropriate category and then to the numbers in the margins of those comment letters. The margin numbers will direct the reader to one or more General Comment Response, or to a Specific Comment Response, or both.

2.3 Range of Comments

Comments were received on a wide range of issues. This range can best be summarized by listing the General Comments. Many of the Specific Comments can also be placed in these general categories, and Specific Comment Responses often refer back to a General Comment Response number.

List of General Comments

1. NMFS does not have authority to issue ITPs for salmon without a 4(d) rule.
2. The 50-year term of the Incidental Take Permit is too long.
3. Tacoma's commitment to habitat preservation and protection in the Green River Watershed must meet or exceed the City of Seattle's level of commitment to habitat protection in the Cedar River Watershed.
4. Water conservation measures and water reuse should be implemented for habitat preservation and restoration; instead of allowing Tacoma Water to withdraw more water from the Green River, Tacoma must be held to a higher standard of water conservation and reuse than is currently implemented.
5. Water users should be required to pay the full costs of habitat preservation and protection measures through rate increases as opposed to relying on revenue from timber harvest in the upper watershed.
6. Describe how Tacoma Water will coordinate with other landowners and managers in the upper watershed to restore and protect fish and wildlife habitat.
7. Tacoma Water should not be allowed to harvest timber in the upper watershed.
8. Tacoma Water should purchase more land in the upper watershed for the preservation and protection of fish and wildlife habitat.

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- 1 9. Habitat Conservation Measure 3-01F, Salvage Harvesting, should be modified to prevent
2 wide-scale forest harvest operations within the forest management zones.
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- 4 10. Existing roads on Tacoma lands in the upper watershed should be abandoned, and no new
5 roads should be constructed.
6
- 7 11. Riparian management measures proposed in Tacoma's forest management zones will not
8 provide functional riparian habitat.
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- 10 12. Tacoma Water should not be allowed to store additional water behind Howard Hanson Dam
11 because of the impacts associated with inundation of reservoir riparian habitats.
12
- 13 13. Tacoma Water should not be allowed to store additional water behind Howard Hanson Dam
14 because of the impacts to instream resources downstream of Howard Hanson Dam.
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- 16 14. The operation agreement between Tacoma Water and the U. S. Army Corps of Engineers
17 must be clearly described in the Habitat Conservation Plan.
18
- 19 15. Tacoma Waters' commitments to its partners in the Second Supply Project appear to affect
20 Tacoma's commitment to implement measures described in the Habitat Conservation Plan;
21 coordination agreements associated with the Second Supply Project must be clearly
22 identified in the Habitat Conservation Plan.
23
- 24 16. Describe how Tacoma Water will coordinate with other landowners and managers in the
25 lower watershed to restore and protect fish and wildlife habitat.
26
- 27 17. Instream flows should be increased to provide additional protection for fish.
28
- 29 18. The Woody Debris Management Program should be modified to restore the volume of
30 woody debris that occurred naturally in the watershed.
31
- 32 19. The Woody Debris Management Program should be modified to address the effects of the
33 program on recreational use of the river.
34
- 35 20. The sediment management plan needs additional detail and should be modified to restore the
36 full function of sediment transport in the Green River.
37
- 38 21. Instream flows should be increased to provide additional recreational opportunity, and
39 impacts to recreation should be mitigated.
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- 1 22. Tacoma Water should be required to ladder Howard Hanson Dam to provide upstream
2 passage of adult salmonids and should not be allowed to truck fish around the dam.
3
- 4 23. Tacoma Water must be required to guarantee the restoration of naturally reproducing
5 populations of anadromous fish above Howard Hanson Dam.
6
- 7 24. Spawning and protective shore habitat in the Green River should be restored and preserved.
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- 9 25. The Habitat Conservation Plan lacks quantifiable data and resource objectives.
10
- 11 26. The adaptive management provisions identified in the Habitat Conservation Plan must allow
12 adjustments to the rate of municipal water storage and withdrawal if monitoring identifies
13 additional impacts to fish and wildlife resources.
14
- 15 27. Instream flows should reflect natural flow variation rather than base or minimum flow
16 requirements.
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- 18 28. Use of the 'best available science', a federal Endangered Species Act requirement, was not
19 incorporated in Tacoma's analyses of impacts in the Habitat Conservation Plan.
20
- 21 29. The direct and indirect effects of Tacoma Water's proposed water withdrawals on future
22 urban growth must be clearly analyzed in the Environmental Impact Statement.
23
- 24 30. The cumulative impacts analyses in the Environmental Impact Statement should include
25 related projects such as the Green River Second Supply Project and the Additional Water
26 Storage Project.
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- 28 31. The comment period for the DEIS/HCP should have been extended.
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